

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE:

CHAPTER 7

CHARLES EDWARD ALLEN

CASE NO. 24-00887-JAW

**TRUSTEE'S APPLICATION FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF NECESSARY EXPENSES
OF ATTORNEY FOR SPECIAL PURPOSE**

COMES NOW, Eileen N. Shaffer, Trustee and files this Application for Allowance of Compensation and Reimbursement of Necessary Expenses on behalf of *Begley Law Firm, PLLC*, and in support thereof, would show unto the Court the following matters, to-wit:

1. That pursuant to the agreement entered into between the debtor and the aforementioned attorney, said attorney was to perform legal services for a contingency fee of thirty-six percent (33 $\frac{1}{3}$ %) of the total settlement, not to exceed fifty percent (50%) of the settlement.

2. That pursuant to the contract, said attorney is entitled to attorney's fees for services rendered in the amount of \$9,999.00, plus expenses incurred of \$196.00, being a total of \$10,195.00. A true and correct copy of Itemization of Expenses is attached hereto and incorporated herein at **Exhibit A**".

3. That no prior applications have been filed on behalf of the Applicant.

4. That the Court has authority to allow this compensation and to pay the same as authorized by 11 U.S.C. § 330, after notice and a hearing.

5. That Applicant has taken into consideration the factors outlined in *Johnson v Georgia Highway Express, Inc.*, 499 F.2d 714 (5th Cir. 1974), made applicable to proceedings in this Court by the decision in *In Re First Colonial Corp. of America*, 544 F. 2d, 1291 (5th Cir., *cert. denied*, 97 S. Ct. 1696 [1977]), in establishing a reasonable request for compensation, and as shown by the discussion of those factors contained herein, the fee requested by Applicant is supported by

the *Johnson* criteria. In addition, the fee is reasonable in light of the requirements that bankruptcy estates be administered as economically as possible and that all the services rendered are of a legal nature requiring the services of an attorney.

6. In accordance with the authorization of special counsel as attorney for Trustee, said attorney has been called upon to provide extensive legal services to the trustee.

7. To a certain extent, other employment was precluded by services rendered in that at certain periods of the administration of this bankruptcy, the legal representation of the trustee prevented the attorney from working on other cases.

8. That the attorney is duly licensed and authorized, practicing in the state of Mississippi.

9. That the Trustee has reviewed the instant application and approves same.

WHEREFORE, PREMISES CONSIDERED, Applicant prays that after notice, the Court will grant the request for attorney's fees and reimbursement of expenses to Special Counsel as set forth above, authorizing payment of the same to Special Counsel upon the terms and conditions set forth above, and for such other relief as is deemed just.

DATED, this the 27th day of February, 2025.

Respectfully submitted,

CHAPTER 7 TRUSTEE

BY:

EILEEN N. SHAFFER
Attorney for Trustee

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CERTIFICATE OF SERVICE

I, Eileen N. Shaffer, Attorney for Trustee, do hereby certify that I have this date mailed by United States Mail, postage prepaid, or electronically transmitted via CM/ECF Noticing, a true and correct copy of the *Trustee's Application for Allowance of Compensation and Reimbursement of Necessary Expenses of Attorney for Special Purpose* to the following on the day and year hereinafter set forth:

Samuel L. Begley, Esq.
P.O. Box 287
Jackson, MS 39205
begleylaw@gmail.com

Allison W. Killebrew, Esq.
Attorney for Debtor
allisonwkillebrew@gmail.com

United States Trustee
USTPRegion05.JA.ECF@usdoj.gov

SO CERTIFIED, this the 27th day of February, 2025.



EILEEN N. SHAFFER